

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 20-cv-1319 (JRT/JFD)

This Document Relates To:

ALL CASES

**DECLARATION OF MONTE LOWE IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL THE PRODUCTION
OF DATA AND DOCUMENTS**

I, Monte Lowe, declare, pursuant to 28 U.S.C. § 1746, that:

1. I have been employed with National Beef Packing Company, LLC ("National Beef") since 1993. I currently serve as Chief Operating Officer and have been in this role since 2021. I work at National Beef's headquarters in Kansas City, Missouri.

2. I make this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Compel the Production of Data and Documents. I am over 21 years of age, suffer no legal disability, and am competent to give this Declaration. I have personal knowledge of the matters described herein based upon my work and experience as an employee at National Beef and information available to me as part of my employment.

3. This Declaration is made for use in the above-captioned civil action and for all other purposes authorized by law.

4. As Chief Operating Officer, I oversee all beef operations at National Beef. This includes National Beef's case ready plants. The Vice-President of Case Ready Operations ultimately reports to me.

5. National Beef's case ready business is a separate line of business distinct from its cattle slaughter and beef processing business.

6. National Beef's slaughter plants harvest cattle and fabricate the carcasses into boxed beef and other products that are sold to numerous wholesale purchasers in the retail, foodservice, distribution, further processing, industrial export, and other channels. These plants are located at Liberal, Kansas, and Dodge City, Kansas. National Beef's subsidiary, Iowa Premium, also slaughters and processes cattle and fabricates carcasses into boxed beef and other products at its Tama, Iowa facility.

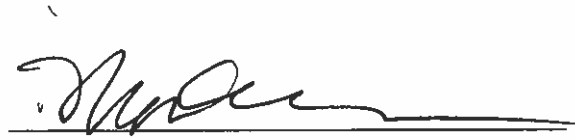
7. National Beef operates separate case ready plants apart from its beef slaughter and processing plants. These case ready plants are located at Hummels Wharf, Pennsylvania, and Moultrie, Georgia and produce case ready products for a very limited customer set in the retail grocery channel. National Beef also operates a steak cutting plant in Kansas City, Kansas, which produces a small quantity of case ready products.

8. National Beef's case ready plants do not procure or slaughter cattle.

9. National Beef's case ready plants procure beef and pork raw material, then further process that raw material into retail-ready products and package them into weight and price labeled items ready to be put into a retail meat case. While some of the beef raw materials come from National Beef's three slaughter and fabrication plants, National Beef also purchases beef raw materials from other companies for processing at its case ready plants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 4, 2022 in Kansas City, Missouri.



Monte Lowe